

1 The Honorable Ricardo S. Martinez  
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11 UNITED STATES DISTRICT COURT  
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13 WESTERN DISTRICT OF WASHINGTON

14 AT SEATTLE  
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16 NORTHWEST ADMINISTRATORS, INC., No. 2:21-cv-1533-RSM  
17 Plaintiff,  
18 v.  
19 PURATOS CORPORATION,  
20 Defendant.  
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28 **STIPULATED REQUEST TO EXTEND  
TIME TO ANSWER COMPLAINT AND  
ORDER**

**NOTE ON MOTION CALENDAR:  
December 8, 2021**

Plaintiff Northwest Administrators, Inc. (“Plaintiff”) and Defendant Puratos Corporation (“Puratos” or “Defendant”), by and through their respective counsel, hereby respectfully request that Defendant’s deadline to answer or otherwise respond to the Complaint in the above-captioned action be extended for a total of 21 days to December 29, 2021.

This request is being made in good faith without intent to delay. An extension is necessary in order to allow the parties time to attempt to resolve this matter.

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2 Dated: December 8, 2021

3 /s/ Russell J. Reid

4 Russell J. Reid, WSBA #2560  
5 REID, MCCARTHY, BALLEY & LEAHY,  
6 LLP  
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9 Attorneys for Plaintiff

10 /s/ Román D. Hernández

11 Román D. Hernández, WSBA #39939  
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15 Portland, Oregon 97204  
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17 Email: roman.hernandez@troutman.com

18 Attorneys for Defendant

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**ORDER**

IT IS SO ORDERED.

DATED this 13<sup>th</sup> day of December, 2021.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

TROUTMAN PEPPER HAMILTON SANDERS LLP

/s/ Román D. Hernández

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STIPULATED REQUEST TO EXTEND TIME TO ANSWER COMPLAINT AND PROPOSED  
ORDER

(2:21-cv-1533-RSM)

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Troutman Pepper  
Hamilton Sanders LLP  
100 SW Main St.  
Suite 1000  
Portland, OR 97204

1 Attorneys for Defendant Puratos Corporation  
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28 STIPULATED REQUEST TO EXTEND TIME TO ANSWER COMPLAINT AND PROPOSED  
ORDER

(2:21-cv-1533-RSM)

121737050

Troutman Pepper  
Hamilton Sanders LLP  
100 SW Main St.  
Suite 1000  
Portland, OR 97204

**CERTIFICATE OF SERVICE**

Under the laws of the state of Washington, the undersigned hereby certifies, under the penalty of perjury, that on December 8, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to counsel of record registered on the CM/ECF system.

Dated: December 8, 2021

## TROUTMAN PEPPER HAMILTON

SANDERS LLP

By: /s/ Román D. Hernández

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Román D. Hernández, WSBA #39939

Attorneys for Defendant